

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF BALTIMORE

UNITED STATES OF AMERICA,

Plaintiff,

v.

NAMOND WILLIAMS,

Defendant.

CASE NO. JFM-90-0135

The Honorable J. Frederick Motz

**MOTION FOR LEAVE TO FILE UNTIMELY NOTICE OF APPEAL
DUE TO UNIQUE CIRCUMSTANCES AND EXCUSABLE NEGLECT**

Comes Now Namond Williams, by and through his undersigned attorney, moving this Court on the basis of the “unique circumstances” doctrine to sanction the technically late filing of his notice of appeal seeking review of this Court’s order of June 17, 2015 (partially reducing his sentence). As for the circumstances warranting this action, Namond submits as follows.

I. The Facts

Namond Williams was sentenced in this Court (Kaufman, J.) some 23+ years ago (1-13-92) to a term of 600 months imprisonment for conspiracy to distribute heroin and cocaine. *See Judgment*, at 1-2. He was 22 years old. *Presentence Investigation Report (PSIR)*, at 1. A young man, Namond was alleged to have been inveigled into the drug activities of his uncle, Linwood Williams, a target of some prominence sought by law enforcement in Baltimore during that period. *PSIR* at ¶¶ 5-6. With respect to quantity culpability, Namond was attributed a grammage of at least 10 kilograms for sentencing purposes, albeit under a regenerative method of calculation that extrapolated from 7,800 grams attributed to the conspiracy as a whole.¹ *PSIR* ¶

¹ This attribution predated the Fourth Circuit’s decision in *Collins* and other sentencing refinements which have ameliorated the principles by which one’s culpability regarding quantity is calculated. The impact of

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